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May 5, 2021

Honorable Colleen McMahon
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

BY ECF

MEMO ENDORSED

5/5/2021
Cousin's birthday - NO
Mother's Day - YES
Sister's birthday - NO

Re: United States v. James Cahill
20 Cr. 521 (CM)

Dear Judge McMahon:

As the Court is aware, defendant James Cahill ("Cahill") is currently at liberty on a fully secured \$500,000 Appearance Bond that contains several conditions including home detention with location monitoring and travel restrictions. By this letter, Cahill respectfully requests permission to attend three family gatherings. On May 8, 2021, his cousin is having a seventieth birthday party from 2:00-9:00 pm., on May 9, 2021, all of his children and grandchildren are getting together at one location from 1:30-5:30 pm to celebrate Mother's Day and on May 16, 2021, from 1:00-6:00 pm, his sister is having a seventieth birthday party. All of the locations for these events have been disclosed to Pretrial Services ("Pretrial") and the government and are within twenty minutes of travel from defendant's home. Cahill has been fully compliant with conditions of his release since he was released on bond over seven months ago. These family events are obviously very important to Cahill given his age and as to the birthday parties, the significance of the milestones they are celebrating.

The government, by Assistant United States Attorney Jason Swergold, defers to Pretrial's position and Pretrial, by United States Pretrial Services Officer Andrew Abbott, does not consent to this application pursuant to Pretrial's policy not to consent to travel for social reasons as to any defendant on home detention.

Thank you for Your Honor's consideration of these requests.

Very truly yours,

Sanford Talkin

Sanford Talkin

cc: AUSA Danielle Sassoon (by ECF)
AUSA Jun Xiang (by ECF)
SAUSA Laura de Oliveira (by ECF)
USPTO Andrew Abbott (by email)